

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

STEPHEN BROWN, JR. AND MATTHEW JURY)	
Individually, and on Behalf of all Others Similarly)	
Situated,)	
)	
Plaintiffs,)	
)	Civil No.:1:10-cv-00514-YK
-against-)	
)	Chief Judge Yvette Kane
)	
TRUEBLUE, INC., f/k/a LABOR READY, INC. and)	NOTICE OF MOTION FOR
LABOR READY NORTHEAST, INC.,)	COURT APPROVAL OF
)	FLSA SETTLEMENT
)	
)	
)	
Defendants.)	

PLEASE TAKE NOTICE that on June 3, 2013, at 9:00 A.M. in the forenoon or as soon thereafter as counsel may be heard, attorneys for the Plaintiffs shall move this Honorable Court, pursuant to 29 U.S.C. §216(b) of the Fair Labor Standards, for an Order approving the settlement reached in this matter, in the amount of EIGHTY FIVE THOUSAND (\$85,000.00) inclusive of attorneys' fees, costs and disbursements.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs shall rely upon the accompanying Memorandum of Law and the Declaration of Counsel with Exhibits attached thereto. Oral argument is not requested.

Dated: May 16, 2013

Respectfully Submitted,
/s/ Craig P. Kalinosky
CRAIG P. KALINOSKI
Supreme Court ID No. 90972
Member of the Bar, U.S.D.C., M.D. Pa.
Law Office of Craig P. Kalinoski
Scranton Bank Building, Suite 1202
108 N. Washington Avenue
Scranton, PA 18503
Telephone: 570-207-4000
Facsimile: 570-207-6900
Kalinoskilaw@aol.com

Steven Bennett Blau
BLAU LEONARD LAW GROUP , LLC
115 River Road, Suite 1027
Edgewater, NJ 07020
Telephone: 201-212-6363
Facsimile: 631-458-1011
sblau@blauleonardlaw.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Steven Bennett Blau hereby certify that, on this date, I caused the foregoing Notice of Motion to be served upon the following via electronic filing on the ECF system:

Justin G. Weber (PA 89266)
PEPPER HAMILTON LLP
100 Market Street, Suite 200
Harrisburg, PA 17108-1181
Telephone: 717.255.1155
Facsimile: 717.238.0575
Email: woodl@pepperlaw.com
weberjg@pepperlaw.com

Admitted Pro Hac Vice
David R. Ongaro
Kyann C. Kalin
Ameilia D. Winchester
Ongaro Burt LLP
595 Market Street, Suite 610
San Francisco, CA 94105
Telephone: 415.433.3900
Facsimile 415.433.3950
Email: kkalin@ongaroburt.com

Attorneys for Defendants
TrueBlue, Inc., f/k/a Labor Ready, Inc.
and Labor Ready Northeast, Inc.

Dated: May 16, 2013

/s/Steven Bennett Blau